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February 24, 2023

Via ECF

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Cardwell v. Davis Polk & Wardwell LLP, et al.
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent Davis Polk & Wardwell LLP and the remaining individual defendants, and write in response to this Court's February 16, 2023 scheduling order (Dkt. No. 306), jointly with counsel for plaintiff Kaloma Cardwell.

Defendants anticipate that a trial of the remaining claims in this matter will last ***two weeks***. In September, October, November, and December 2023, defendants are ***unavailable for a trial*** during the following date ranges:

- September 25-October 20;
- November 8-17;
- December 1-8.

Plaintiff anticipates that a trial of the remaining claims in this matter will last ***four weeks***. In September, October, November, and December 2023, plaintiff is ***unavailable for a trial*** during the following date ranges:

- September 7-10 and 18-24
- October 30-November 4;

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- November 20-24
- December 18-29

In light of an anticipated trial and the timeframes under consideration, the parties respectfully request an extension, *sine die*, of the pre-trial submission deadlines set forth in your Honor's Individual Rules of Practice 5(A–C), until a trial schedule is set.

Respectfully,

/s/ Susanna M. Buergerl

Susanna M. Buergerl

cc: All Counsel of Record (via ECF)